UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK

STEPHANIE ZOBAY, et al.,

Plaintiffs,

-v.-

MTN GROUP LIMITED, et al.,

Defendants.

Case No.: 1:21-cv-03503-CBA

FED. R. CIV. P. 7.1 CORPORATE DISCLOSURE STATEMENT OF DEFENDANT MTN (DUBAI) LIMITED

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, Defendant MTN (Dubai) Limited makes the following disclosures through its undersigned counsel:

MTN (Dubai) Limited is a Dubai company and is wholly owned by MTN International (Mauritius) Limited, which is wholly owned by MTN International Proprietary Limited, which is wholly owned by Mobile Telephone Networks Holdings Limited, which is wholly owned by MTN Group Limited.

Dated: November 5, 2021 Respectfully submitted,

/s/ Timothy P. Harkness

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^{*} Applications for admission forthcoming.